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	UNITED STATES		
15	NORTHERN DISTR		
	SAN FRANCI	SCO DIVIS	SION
16	FEDERAL TRADE COMMISSION,	Case No	. 3:22-cv-02880-JSC
17	TEDERAL TRADE COMMISSION,	Case No.	. 3.22-CV-02880-33C
L /	Plaintiff,	(1) AME	ENDED ADMINISTRATIVE
18	Flamum,	` ′	N SEEKING IN CAMERA
			MENT OF CERTAIN EXHIBITS
19	V.		
	MICDOGOFT CODDOD ATION 1		ANT TO CIVIL L.R. 7-11 AND 79-5;
20	MICROSOFT CORPORATION and	and	I ADATION OF DACE DODINGON
1	ACTIVISION BLIZZARD, INC.,		LARATION OF PAGE ROBINSON
21	D.C. 1.	IN SUPE	PORT THEREOF
22	Defendants.	D .	TID A
		Date:	TBA
23		Time:	TBA
		Dept.:	Courtroom 8—19th Floor
24		Judge:	Honorable Jacqueline S. Corley
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Pursuant to Civil Local Rules 7-11 and 79-5 and the June 14th Order Re: Evidentiary Hearing on Preliminary Injunction Motion (ECF No. 76) ("Order"), Defendant Activision Blizzard, Inc. ("Activision") does respectfully move this Court to seal from public disclosure and permit *in camera* treatment of certain exhibits that appear on Plaintiff Federal Trade Commission ("FTC") and Defendants' (collectively, the "Parties") exhibit lists.

On June 14, 2023, the Court issued an Order directing the Parties, among other things, to identify "each exhibit each party intends to offer at the evidentiary hearing either through a witness declaration or live testimony," including "which exhibits are subject to a confidentiality designation and where on the docket the Court can locate a declaration in support of sealing as required by Local Rule 79-5." Order, at Section A.2. On June 18, 19 and 21, 2023, the Parties exchanged their respective exhibit lists, which identify exhibits that the Parties plan to introduce during the evidentiary hearing.

Activision is filing this Amended Administrative Motion, which replaces the Administrative Motion filed at ECF 148, to provide the legal bases for sealing the exhibits that appear on the Parties' lists at PX7000, PX7001, PX7004, PX7006, PX7008, PX7030, PX7033, PX7035, PX7038, PX7039 and PX7052.

As described in detail herein, many of the exhibits on the Parties' lists contain highly sensitive and proprietary business information that would injure Activision if made publicly available. The following table describes the highly confidential material found in the exhibits identified in the Parties' exhibit lists and the specific bases supporting sealing of the information. *See* Civ. L.R. 79-5(c). The proposed sealing reflects Activision's good-faith efforts to narrowly seek sealing of only that information which is competitively sensitive and contained in internal documents, the public disclosure of which would cause injury to Activision that cannot be avoided through any more restrictive alternative means:¹

¹ Activision is filing this motion one day after the parties' completed the exchange of their respective exhibit lists, which collectively contain 834 exhibits. Activision is continuing to review the exhibits for the purpose of identifying the contents thereof that warrant sealing, and further attempting to narrow the request for confidential treatment. Activision will file a further amended Administrative Motion should it determine through its ongoing review that it can further narrow its sealing request.

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Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for In Camera Treatment Request				
FTC's Exhibit List							
PX0004	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations discussing business strategy, which could be used to injure Activision if made publicly available.				
PX0060	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations discussing business strategy, which could be used to injure Activision if made publicly available.				
PX0079	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive				

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> Camera Treatment	Basis for <i>In Camera</i> Treatment Request
3 4 5 6				landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations discussing business strategy, which could be used to injure Activision if made publicly available.
7 8 9 10 11 12 13 14	PX2002	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, strategic evaluation of forward-looking opportunities, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, and revenue figures and projections, which could be used to injure Activision if made publicly available.
15 16 17 18 19	PX2006	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes and strategic evaluation of forward-looking opportunities, which could be used to injure Activision if made publicly available.
20 21 22 23 24 25	PX2008	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, business partnerships, and terms of existing confidential agreements, which could be used to injure Activision if made publicly available.
26 27 28	PX2017	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, strategic evaluation of forward-looking opportunities, assessment of the

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request
3 4 5				competitive landscape, business partnerships, and terms of existing confidential agreements, which could be used to injure Activision if made publicly available.
6 7 8 9 10 11 12 13 14 15	PX2049	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations discussing business strategy, which could be used to injure Activision if made publicly available.
16 17 18 19 20 21 22 23	PX2073	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, and revenue figures and projections, which could be used to injure Activision if made publicly available.
2425262728	PX2082	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships,

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for In Camera Treatment	Basis for <i>In Camera</i> Treatment Request
3 4				terms of existing confidential agreements, revenue figures and projections, and internal presentations
5				discussing business strategy, which could be used to injure Activision if
6				made publicly available.
7	PX2083	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
8				including, but not limited to, internal decision-making processes,
9				investment decisions, strategic evaluation of forward-looking
11				opportunities, market share analyses, assessment of the competitive
12				landscape, business partnerships, terms of existing confidential
13				agreements, revenue figures and projections, and internal presentations
14				discussing business strategy, which
15				could be used to injure Activision if made publicly available.
16	PX2093	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
17		List		highly sensitive information including, but not limited to, internal
18				decision-making processes, investment decisions, strategic
19				evaluation of forward-looking
20				opportunities, market share analyses, assessment of the competitive
21				landscape, business partnerships, terms of existing confidential
22				agreements, and revenue figures and projections, which could be used to
23				injure Activision if made publicly available.
24	PX2094	FTC's Exhibit	Document Withheld	
25	FA2094	List	Document withheld	This exhibit contains non-public and highly sensitive information
26				including, but not limited to, internal decision-making processes,
27				investment decisions, strategic evaluation of forward-looking
28				opportunities, market share analyses, assessment of the competitive

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for In Camera Treatment Request
3 4 5				landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations
6				discussing business strategy, which could be used to injure Activision if made publicly available.
7 8	PX2104	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal
9 10				decision-making processes, investment decisions, strategic evaluation of forward-looking
11				opportunities, market share analyses, assessment of the competitive
12 13				landscape, business partnerships, terms of existing confidential
14				agreements, and revenue figures and projections, which could be used to injure Activision if made publicly
15				available.
1617	PX2107	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal
18				decision-making processes, investment decisions, strategic
19				evaluation of forward-looking opportunities, market share analyses,
20 21				business partnerships, terms of existing confidential agreements,
21 22				revenue figures and projections, and internal presentations discussing
23				business strategy, which could be used to injure Activision if made publicly
24	DV0112	ETC: E 131:	D (W/31 11	available.
25	PX2113	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
2627				including, but not limited to, internal decision-making processes, investment decisions, strategic
28				evaluation of forward-looking opportunities, market share analyses, assessment of the competitive

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request
3 4				landscape, business partnerships, terms of existing confidential
5				agreements, revenue figures and projections, and internal presentations discussing business strategy, which
6				could be used to injure Activision if made publicly available.
7 8	PX2115	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and
9		List		highly sensitive information including, but not limited to, internal decision-making processes,
10				investment decisions, strategic evaluation of forward-looking
11				opportunities, market share analyses, assessment of the competitive
12 13				landscape, business partnerships, terms of existing confidential
14				agreements, revenue figures and projections, and internal presentations
15				discussing business strategy, which could be used to injure Activision if made publicly available.
16	PX2133	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
17 18		List		highly sensitive information including, but not limited to, internal
19				decision-making processes, investment decisions, strategic
20				evaluation of forward-looking opportunities, market share analyses, assessment of the competitive
21				landscape, business partnerships, terms of existing confidential
22 23				agreements, and revenue figures and projections, which could be used to
24				injure Activision if made publicly available.
25	PX2138	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
26		List		highly sensitive information including, but not limited to, internal decision making processes
27 28				decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses,

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2	Document	Party Seeking to Introduce Exhibit	Information Requested for In Camera Treatment	Basis for <i>In Camera</i> Treatment Request
3 4				assessment of the competitive landscape, business partnerships, terms of existing confidential
5				agreements, revenue figures and projections, and internal presentations
6 7				discussing business strategy, which could be used to injure Activision if made publicly available.
8	PX2139	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal
10				decision-making processes, investment decisions, strategic
11				evaluation of forward-looking opportunities, assessment of the
12 13				competitive landscape, business partnerships, terms of existing
14				confidential agreements, and revenue figures and projections, which could
15				be used to injure Activision if made publicly available.
16	PX2157	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
17		List		highly sensitive information including, but not limited to, internal
18				decision-making processes, investment decisions, strategic
19				evaluation of forward-looking opportunities, market share analyses,
20 21				assessment of the competitive landscape, business partnerships,
22				terms of existing confidential agreements, revenue figures and
23				projections, and internal presentations discussing business strategy, which
24				could be used to injure Activision if made publicly available.
25	PX2159	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
26		List		highly sensitive information including, but not limited to, strategic
27				evaluation of forward-looking opportunities, assessment of the
28				competitive landscape, business partnerships, terms of existing

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request
3 4				confidential agreements, revenue figures and projections, and internal presentations discussing business
5				strategy, which could be used to injure Activision if made publicly available.
6 7 8	PX2160	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes,
9				investment decisions, strategic evaluation of forward-looking opportunities, market share analyses,
10 11				assessment of the competitive landscape, business partnerships,
12				terms of existing confidential agreements, revenue figures and projections, and internal presentations
13 14				discussing business strategy, which could be used to injure Activision if made publicly available.
15	PX2167	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
16 17		List		highly sensitive information including, but not limited to, internal decision-making processes,
18				investment decisions, strategic evaluation of forward-looking
19				opportunities, market share analyses, assessment of the competitive
$\frac{20}{21}$				landscape, business partnerships, terms of existing confidential
22				agreements, revenue figures and projections, and internal presentations
23				discussing business strategy, which could be used to injure Activision if made publicly available.
24	PX2170	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
25 26		List		highly sensitive information including, but not limited to, business
27				partnerships and terms of existing confidential agreements, which could
28				be used to injure Activision if made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request
PX2183	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
			including, but not limited to, internal decision-making processes,
			investment decisions, strategic evaluation of forward-looking
			opportunities, assessment of the competitive landscape, business
			partnerships, revenue figures and projections, and internal presentations
			discussing business strategy, which could be used to injure Activision if made publicly available.
PX2186	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
	List		highly sensitive information including, but not limited to, internal
			decision-making processes, investment decisions, strategic
			evaluation of forward-looking
			opportunities, market share analyses, assessment of the competitive landscape, business partnerships,
			terms of existing confidential agreements, revenue figures and
			projections, and internal presentations discussing business strategy, which
			could be used to injure Activision if made publicly available.
PX2189	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and
	List		highly sensitive information including, but not limited to, internal
			decision-making processes, investment decisions, strategic
			evaluation of forward-looking opportunities, market share analyses,
			assessment of the competitive landscape, business partnerships,
			terms of existing confidential agreements, revenue figures and
			projections, and internal presentations discussing business strategy, which
			could be used to injure Activision if made publicly available.

2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for In Camera Treatment Request
3	PX2197	FTC's Exhibit	Redacted Version	This portion contains non-public and
4		List	Forthcoming	highly sensitive information including, but not limited to, internal
5				decision-making processes, strategic evaluation of forward-looking
6				opportunities, assessment of the competitive landscape, and business
7				partnerships, which could be used to
8 9				injure Activision if made publicly available.
10	PX2198	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
11				including, but not limited to, internal decision-making processes,
12				investment decisions, strategic
13				evaluation of forward-looking opportunities, assessment of the
14				competitive landscape, business partnerships, terms of existing
15				confidential agreements, and revenue figures and projections, which could
16				be used to injure Activision if made publicly available.
17 18	PX2199	FTC's Exhibit List	Redacted Version	This portion contains non-public and
19		List	Forthcoming	highly sensitive information including, but not limited to, internal
20				decision-making processes, investment decisions, strategic
21				evaluation of forward-looking opportunities, market share analyses,
22				assessment of the competitive landscape, business partnerships,
23				terms of existing confidential agreements, revenue figures and
24				projections, and internal presentations discussing business strategy, which
25				could be used to injure Activision if
26				made publicly available.

AMENDED ADMIN MOTION SEEKING IN CAMERA TREATMENT

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1	Document	Party Seeking	Information	Basis for In Camera Treatment
2	Document	to Introduce Exhibit	Requested for In Camera Treatment	Request Treatment
3 4	PX2203	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal
5				decision-making processes, strategic evaluation of forward-looking
6				opportunities, assessment of the competitive landscape, business
7				partnerships, revenue figures and projections, and internal presentations
8 9				discussing business strategy, which could be used to injure Activision if
10				made publicly available.
11	PX2265	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
12				including, but not limited to, internal decision-making processes,
13				investment decisions, strategic
14				evaluation of forward-looking opportunities, market share analyses,
15				assessment of the competitive landscape, business partnerships,
16				terms of existing confidential agreements, and revenue figures and
17 18				projections, which could be used to injure Activision if made publicly
19	DV2292	FTC's Exhibit	Dada stad Wansian	available.
20	PX2282	List Exhibit	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
21				including, but not limited to, internal decision-making processes,
22				investment decisions, strategic evaluation of forward-looking
23				opportunities, revenue figures and projections, and internal presentations
24				discussing business strategy, which could be used to injure Activision if
25	D224000			made publicly available.
26 27	PX2283	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
28				including, but not limited to, internal decision-making processes, assessment of the competitive

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for In Camera Treatment Request
3 4 5				landscape, business partnerships, and revenue figures and projections, which could be used to injure Activision if made publicly available.
6 7 8 9 10 11 12	PX2285	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, strategic evaluation of forward-looking opportunities, assessment of the competitive landscape, business partnerships, revenue figures and projections, and internal presentations discussing business strategy, which could be used to injure Activision if made publicly available.
13 14 15 16 17 18	PX2288	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, and strategic evaluation of forward-looking opportunities, which could be used to injure Activision if made publicly available.
19 20 21 22 23 24 25	PX2391	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, and revenue figures and projections, which could be used to injure Activision if made publicly available.
262728	PX2392	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, assessment of the

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request
3 4 5			competitive landscape, business partnerships, terms of existing confidential agreements, and revenue figures and projections, which could be used to injure Activision if made publicly available.
PX2393	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, strategic evaluation of forward-looking opportunities, assessment of the competitive landscape, business partnerships, and terms of existing confidential agreements, which could be used to injure Activision if made publicly available.
PX2396	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, strategic evaluation of forward-looking opportunities, assessment of the competitive landscape, and business partnerships, which could be used to injure Activision if made publicly available.
PX2406	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, strategic evaluation of forward-looking opportunities, and business partnerships, which could be used to injure Activision if made publicly available.
PX2410	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, and strategic evaluation of forward-looking

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$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> Camera Treatment	Basis for <i>In Camera</i> Treatment Request
3				opportunities, which could be used to
4				injure Activision if made publicly available.
5				
6	PX2415	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
7	1112	List		highly sensitive information
8				including, but not limited to, strategic evaluation of forward-looking
9				opportunities, assessment of the competitive landscape, business
10				partnerships, terms of existing confidential agreements, and revenue
11				figures and projections, which could be used to injure Activision if made
12				publicly available.
13	PX2419	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
14		List		highly sensitive information including, but not limited to, strategic
15				evaluation of forward-looking opportunities, assessment of the
16				competitive landscape, business partnerships, terms of existing
17				confidential agreements, and revenue
18				figures and projections, which could be used to injure Activision if made
19				publicly available.
20	PX2421	FTC's Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
21			C	including, but not limited to, internal decision-making processes, strategic
22				evaluation of forward-looking
23				opportunities, assessment of the competitive landscape, business
24				partnerships, and terms of existing confidential agreements, which could
25				be used to injure Activision if made publicly available.
26				r

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for In Camera Treatment Request
PX2443	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
			including, but not limited to, internal decision-making processes, strategic evaluation of forward-looking
			opportunities, assessment of the competitive landscape, and business
			partnerships, which could be used to injure Activision if made publicly available.
DV7000	ETC: E 1:1:	D (W741-11	
PX7000	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal
			decision-making processes, strategic evaluation of forward-looking
			opportunities, assessment of the competitive landscape, and business
			partnerships, which could be used to injure Activision if made publicly
			available.
PX70001	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
			including, but not limited to, internal decision-making processes, strategic
			evaluation of forward-looking opportunities, assessment of the
			competitive landscape, and business partnerships, which could be used to
			injure Activision if made publicly available.
PX7004	FTC's Exhibit	Document Withheld	This exhibit contains non-public and
	List		highly sensitive information including, but not limited to, internal
			decision-making processes, strategic evaluation of forward-looking
			opportunities, assessment of the competitive landscape, and business
			partnerships, which could be used to injure Activision if made publicly
			available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for In Camera Treatment Request
PX7006	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
			including, but not limited to, internal decision-making processes, strategic evaluation of forward-looking
			opportunities, assessment of the competitive landscape, and business
			partnerships, which could be used to injure Activision if made publicly available.
PX7008	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and
	List		highly sensitive information including, but not limited to, internal decision-making processes, strategic
			evaluation of forward-looking opportunities, assessment of the
			competitive landscape, and business partnerships, which could be used to
			injure Activision if made publicly available.
PX7030	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
			including, but not limited to, internal decision-making processes, strategic
			evaluation of forward-looking opportunities, assessment of the
			competitive landscape, and business partnerships, which could be used to injure Activision if made publicly
			available.
PX7033	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
			including, but not limited to, internal decision-making processes, strategic
			evaluation of forward-looking opportunities, assessment of the
			competitive landscape, and business partnerships, which could be used to
			injure Activision if made publicly available.

1				
1 2	Document	Party Seeking to Introduce	Information Requested for <i>In</i>	Basis for <i>In Camera</i> Treatment Request
		Exhibit	Camera Treatment	
3 4	PX7035	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal
5				decision-making processes, strategic evaluation of forward-looking
6				opportunities, assessment of the competitive landscape, and business
7 8				partnerships, which could be used to injure Activision if made publicly
9				available.
10	PX7038	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
11				including, but not limited to, internal decision-making processes, strategic
12				evaluation of forward-looking opportunities, assessment of the
13				competitive landscape, and business
14				partnerships, which could be used to injure Activision if made publicly available.
15	DVZ020	ETC. E 111	D	
16 17	PX7039	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal
18				decision-making processes, strategic evaluation of forward-looking
19				opportunities, assessment of the competitive landscape, and business
20				partnerships, which could be used to injure Activision if made publicly
21				available.
22	PX7052	FTC's Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
23				including, but not limited to, internal
24				decision-making processes, strategic evaluation of forward-looking
25				opportunities, assessment of the competitive landscape, and business
26				partnerships, which could be used to injure Activision if made publicly
27				available.
28			Defendants' Exhibit	List

Document 2	Party Seeking to Introduce Exhibit	Information Requested for In Camera Treatment	Basis for <i>In Camera</i> Treatment Request
3 RX1001	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
5			including, but not limited to, internal decision-making processes, investment decisions, strategic
			evaluation of forward-looking opportunities, assessment of the
			competitive landscape, business partnerships, terms of existing
			confidential agreements, and revenue figures and projections, which could
			be used to injure Activision if made publicly available.
RX1002	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and
	Exhibit List	Porticonning	highly sensitive information including, but not limited to, internal
			decision-making processes, investment decisions, strategic
			evaluation of forward-looking opportunities, revenue figures and
			projections, and internal business strategy, which could be used to injure Activision if made publicly available.
RX1006	Defendants'	Redacted Version	This portion contains non-public and
	Exhibit List	Forthcoming	highly sensitive information including, but not limited to, strategic
			evaluation of forward-looking opportunities, assessment of the
			competitive landscape, business partnerships, revenue figures and
			projections, and internal business strategy and analysis, which could be
			used to injure Activision if made publicly available.
RX1008	Defendants'	Redacted Version	This portion contains non-public and
	Exhibit List	Forthcoming	highly sensitive information including, but not limited to, internal
			decision-making processes, investment decisions, strategic
			evaluation of forward-looking opportunities, market share analyses,

1	Document	Party Seeking	Information	Basis for In Camera Treatment
2		to Introduce Exhibit	Requested for In Camera Treatment	Request
3 4				assessment of the competitive landscape, business partnerships, terms of existing confidential
5				agreements, revenue figures and projections, and internal presentations
6				discussing business strategy, which could be used to injure Activision if
7		_		made publicly available.
8 9	RX1011	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal
10				decision-making processes, investment decisions, strategic
11				evaluation of forward-looking
12				opportunities, assessment of the competitive landscape, business
13				partnerships, terms of existing confidential agreements, revenue
14				figures and projections, and internal business strategy, which could be used
15				to injure Activision if made publicly available.
16	RX1012	Defendants'	Document Withheld	This exhibit contains non-public and
17		Exhibit List		highly sensitive information including, but not limited to, internal
18				decision-making processes, strategic evaluation of forward-looking
19				opportunities, business partnerships, terms of existing confidential
20				agreements, and internal business
21				strategy, which could be used to injure Activision if made publicly available.
22				
23	RX1013	Defendants'	Redacted Version	This portion contains non-public and highly sensitive information
24		Exhibit List	Forthcoming	including, but not limited to, internal
25				decision-making processes, strategic evaluation of forward-looking
26				opportunities, assessment of the competitive landscape, business
27				partnerships, terms of existing confidential agreements, and internal
28				business strategy, which could be used to injure Activision if made publicly

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> Camera Treatment	Basis for <i>In Camera</i> Treatment Request
3				available.
4				
5				
6 7	RX1015	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
8				including, but not limited to, internal decision-making processes, strategic evaluation of forward-looking
9				opportunities, assessment of the
10				competitive landscape, business partnerships, terms of existing
11				confidential agreements, and internal business strategy, which could be used
12				to injure Activision if made publicly available.
13				This portion contains non-public and
14	RX1016	Defendants' Exhibit List	Redacted Version Forthcoming	highly sensitive information
15				including, but not limited to, internal decision-making processes, strategic
16				evaluation of forward-looking opportunities, business partnerships,
17				terms of existing confidential agreements, and internal business
18				strategy, which could be used to injure Activision if made publicly available.
19				
20	RX1017	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
21			-	including, but not limited to, internal decision-making processes,
22				investment decisions, strategic evaluation of forward-looking
23				opportunities, assessment of the competitive landscape, business
24 25				partnerships, revenue figures and
$\begin{bmatrix} 25 \\ 26 \end{bmatrix}$				projections, and internal business strategy, which could be used to injure
$\begin{bmatrix} 20 \\ 27 \end{bmatrix}$				Activision if made publicly available.

AMENDED ADMIN MOTION SEEKING IN CAMERA TREATMENT

1	Document	Party Seeking	Information	Basis for In Camera Treatment
2	Document	to Introduce Exhibit	Requested for <i>In</i> Camera Treatment	Request
3 4	RX1018	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, strategic
5				evaluation of forward-looking
6 7				opportunities, business partnerships, and internal business strategy, which could be used to injure Activision if
8				made publicly available.
9	RX1019	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
10		Exmort Eist	Tortheoming	including, but not limited to, internal decision-making processes, strategic
11				evaluation of forward-looking opportunities, business partnerships,
12				terms of existing confidential
13				agreements, and internal business strategy, which could be used to injure
14				Activision if made publicly available.
15				
16 17	RX1020	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
18				including, but not limited to, internal decision-making processes,
19				investment decisions, strategic evaluation of forward-looking
20				opportunities, market share analyses, assessment of the competitive
21				landscape, business partnerships, terms of existing confidential
22				agreements, and revenue figures and projections, which could be used to
23				injure Activision if made publicly available.
24				
25	RX1021	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
26				including, but not limited to, internal decision-making processes,
27 28				investment decisions, strategic evaluation of forward-looking
20				opportunities, market share analyses,

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request
3 4				assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, and revenue figures and
5 6				projections, which could be used to injure Activision if made publicly
7				available.
8	RX1022	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal
9 10				decision-making processes, investment decisions, strategic
11				evaluation of forward-looking opportunities, market share analyses,
12				assessment of the competitive landscape, business partnerships,
13				terms of existing confidential
14				agreements, revenue figures and projections, and internal presentations
15				discussing business strategy, which could be used to injure Activision if made publicly available.
16				-
17	RX1024	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
18				including, but not limited to, internal decision-making processes,
19				investment decisions, strategic evaluation of forward-looking
20				opportunities, market share analyses,
21				assessment of the competitive landscape, business partnerships,
22				terms of existing confidential agreements, revenue figures and
23				projections, and internal presentations discussing business strategy, which
24				could be used to injure Activision if made publicly available.
25				1 7
26	RX1026	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
27 28				including, but not limited to, internal decision-making processes, investment decisions, strategic

1	Document	Party Seeking	Information	Basis for <i>In Camera</i> Treatment
2	Document	to Introduce Exhibit	Requested for In Camera Treatment	Request
3				evaluation of forward-looking opportunities, market share analyses,
4				assessment of the competitive landscape, business partnerships,
5				terms of existing confidential agreements, revenue figures and
6				projections, and internal presentations
7				discussing business strategy, which could be used to injure Activision if
8				made publicly available.
9	RX1027	Defendants'	Redacted Version	This portion contains non-public and
10		Exhibit List	Forthcoming	highly sensitive information including, but not limited to, internal
11				decision-making processes, investment decisions, strategic
12				evaluation of forward-looking opportunities, market share analyses,
13				assessment of the competitive
14				landscape, business partnerships, terms of existing confidential
15				agreements, revenue figures and projections, and internal presentations
16				discussing business strategy, which could be used to injure Activision if
17				made publicly available.
18	RX1030	Defendants'	Redacted Version	This portion contains non-public and
19	KATOSO	Exhibit List	Forthcoming	highly sensitive information including, but not limited to, internal
20				decision-making processes, investment decisions, strategic
21				evaluation of forward-looking
22				opportunities, market share analyses, assessment of the competitive
23				landscape, business partnerships, terms of existing confidential
24				agreements, revenue figures and
25				projections, and internal presentations discussing business strategy, which
26				could be used to injure Activision if made publicly available.
27				r ,

1	Document	Party Seeking	Information	Basis for In Camera Treatment
2		to Introduce Exhibit	Requested for In Camera Treatment	Request
3 4	RX1031	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
5				including, but not limited to, internal decision-making processes,
6				investment decisions, strategic evaluation of forward-looking
7				opportunities, market share analyses, assessment of the competitive landscape, business partnerships,
8				terms of existing confidential agreements, revenue figures and
9 10				projections, and internal presentations discussing business strategy, which
11				could be used to injure Activision if made publicly available.
12	RX1032	Defendants'	Document Withheld	This exhibit contains non-public and
13	KX1032	Exhibit List	Document withhere	highly sensitive information including, but not limited to, internal
14				decision-making processes, investment decisions, strategic
15 16				evaluation of forward-looking opportunities, market share analyses,
17				assessment of the competitive landscape, business partnerships,
18				terms of existing confidential agreements, revenue figures and projections, and internal presentations
19				discussing business strategy, which could be used to injure Activision if
20				made publicly available.
21 22	RX1033	Defendants' Exhibit List	Redacted Version	This portion contains non-public and highly sensitive information
23		Exilibit List	Forthcoming	including, but not limited to, internal decision-making processes,
24				investment decisions, strategic evaluation of forward-looking
25				opportunities, market share analyses, assessment of the competitive
26				landscape, business partnerships, terms of existing confidential
27 28				agreements, revenue figures and projections, and internal presentations discussing business strategy, which

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request
3 4				could be used to injure Activision if made publicly available.
5				
6 7	RX1036	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes,
8 9				investment decisions, strategic evaluation of forward-looking opportunities, market share analyses,
10 11				assessment of the competitive landscape, business partnerships,
12				terms of existing confidential agreements, revenue figures and projections, and internal presentations
13 14				discussing business strategy, which could be used to injure Activision if made publicly available.
15 16 17 18 19 20 21 22 23 24	RX1038	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations discussing business strategy, which could be used to injure Activision if made publicly available.
25 26 27 28	RX1041	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive

1	D	D 4 G I	T 6	
2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> Camera Treatment	Basis for In Camera Treatment Request
3				landscape, business partnerships,
4				terms of existing confidential agreements, revenue figures and
5				projections, and internal presentations discussing business strategy, which
6				could be used to injure Activision if
7				made publicly available.
8	RX1042	Defendants'	Document Withheld	This exhibit contains non-public and highly sensitive information
9		Exhibit List		including, but not limited to, internal
10				decision-making processes, investment decisions, strategic
11				evaluation of forward-looking opportunities, market share analyses,
12				assessment of the competitive landscape, business partnerships,
13				terms of existing confidential
14				agreements, revenue figures and projections, and internal presentations
15				discussing business strategy, which could be used to injure Activision if
16				made publicly available.
17				
18	RX1044	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
19				including, but not limited to, internal decision-making processes,
20				investment decisions, strategic evaluation of forward-looking
21				opportunities, market share analyses,
22				assessment of the competitive landscape, business partnerships,
23				terms of existing confidential agreements, revenue figures and
24				projections, and internal presentations
25				discussing business strategy, which could be used to injure Activision if
26				made publicly available.

Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for In Camera Treatment Request
RX1047	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
			including, but not limited to, internal decision-making processes, strategic evaluation of forward-looking
			opportunities, assessment of the competitive landscape, and internal
			presentations discussing business
			strategy, which could be used to injure Activision if made publicly available.
RX1048	Defendants'	Redacted Version	This portion contains non-public and
1111111	Exhibit List	Forthcoming	highly sensitive information including, but not limited to, internal decision-making processes, strategic
			evaluation of forward-looking
			opportunities, market share analyses, assessment of the competitive
			landscape, business partnerships, terms of existing confidential
			agreements, and revenue figures and projections, which could be used to
			injure Activision if made publicly available.
RX1259	Defendants'	Document Withheld	This exhibit contains non-public and highly sensitive information
	Exhibit List		including, but not limited to, internal
			decision-making processes, strategic evaluation of forward-looking
			opportunities, market share analyses, assessment of the competitive
			landscape, business partnerships, terms of existing confidential
			agreements, revenue figures and projections, and internal presentations
			discussing business strategy, which
			could be used to injure Activision if made publicly available.
RX1260	Defendants'	Document Withheld	This exhibit contains non-public and
10.11200	Exhibit List	Document Withheld	highly sensitive information including, but not limited to, internal
			decision-making processes, investment decisions, strategic

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request
3 4				evaluation of forward-looking opportunities, market share analyses,
5				assessment of the competitive landscape, business partnerships, terms of existing confidential
6				agreements, revenue figures and projections, and internal presentations
7 8				discussing business strategy, which could be used to injure Activision if
9				made publicly available.
10	RX1273	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal
11				decision-making processes, investment decisions, strategic
12				evaluation of forward-looking opportunities, market share analyses,
13				assessment of the competitive
14 15				landscape, business partnerships, terms of existing confidential
16				agreements, revenue figures and projections, and internal presentations
17				discussing business strategy, which could be used to injure Activision if
18				made publicly available.
19	RX1275	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
20				including, but not limited to, internal decision-making processes,
21				investment decisions, strategic evaluation of forward-looking
22				opportunities, assessment of the competitive landscape, business
23 24				partnerships, terms of existing confidential agreements, and revenue
25				figures and projections, which could be used to injure Activision if made
26	RX1276	Defendants'	Document Withheld	publicly available. This exhibit contains non-public and
27	1011210	Exhibit List	Document Willineid	highly sensitive information including, but not limited to, internal
28				decision-making processes, investment decisions, strategic

1	Document	Party Seeking	Information	Basis for In Camera Treatment
2		to Introduce Exhibit	Requested for <i>In Camera</i> Treatment	Request
3 4				evaluation of forward-looking opportunities, assessment of the competitive landscape, business
5				partnerships, terms of existing confidential agreements, and revenue
6				figures and projections, which could be used to injure Activision if made
7				publicly available.
8 9	RX1281	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
10		LAMOR LIST	Torthcoming	including, but not limited to, internal decision-making processes, strategic
11				evaluation of forward-looking opportunities, assessment of the
12				competitive landscape, which could be used to injure Activision if made
13				publicly available.
14	RX1282	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
15		Exmort Bist		including, but not limited to, internal decision-making processes,
16 17				investment decisions, strategic evaluation of forward-looking
18				opportunities, market share analyses, assessment of the competitive
19				landscape, business partnerships, terms of existing confidential
20				agreements, revenue figures and projections, and internal presentations
21				discussing business strategy, which could be used to injure Activision if
22				made publicly available.
23	RX1284	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
24		Exilioit List		including, but not limited to, internal decision-making processes,
25				investment decisions, strategic
26				evaluation of forward-looking opportunities, market share analyses,
27 28				assessment of the competitive landscape, business partnerships,
_0				terms of existing confidential

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> Camera Treatment	Basis for <i>In Camera</i> Treatment Request
3		EXHIBIT	Camera Treatment	agreements, revenue figures and
4				projections, and internal presentations discussing business strategy, which
5				could be used to injure Activision if made publicly available.
6				This exhibit contains non-public and
7	RX1285	Defendants' Exhibit List	Document Withheld	highly sensitive information
8				including, but not limited to, internal decision-making processes,
9				investment decisions, strategic evaluation of forward-looking
10				opportunities, market share analyses, assessment of the competitive
11				landscape, business partnerships,
12				terms of existing confidential agreements, revenue figures and
13				projections, and internal presentations discussing business strategy, which
14				could be used to injure Activision if made publicly available.
15	RX1286	Defendants'	Redacted Version	This portion contains non-public and highly sensitive information
16		Exhibit List	Forthcoming	including, but not limited to, internal
17				decision-making processes, investment decisions, and strategic
18				evaluation of forward-looking opportunities, which could be used to
19				injure Activision if made publicly available.
20				This exhibit contains non-public and
21	RX1289	Defendants' Exhibit List	Document Withheld	highly sensitive information
22				including, but not limited to, internal decision-making processes,
23				investment decisions, strategic evaluation of forward-looking
24				opportunities, market share analyses, assessment of the competitive
2526				landscape, business partnerships,
27				terms of existing confidential agreements, revenue figures and
28				projections, and internal presentations discussing business strategy, which
20				could be used to injure Activision if

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for In Camera Treatment	Basis for <i>In Camera</i> Treatment Request
3				made publicly available.
4				
5				
6	RX1296	Defendants'	Document Withheld	This exhibit contains non-public and
7		Exhibit List		highly sensitive information including, but not limited to, internal
8				decision-making processes, investment decisions, strategic
9				evaluation of forward-looking
10				opportunities, market share analyses, assessment of the competitive
11				landscape, business partnerships, terms of existing confidential
12				agreements, revenue figures and projections, and internal presentations
13				discussing business strategy, which
14				could be used to injure Activision if made publicly available.
15	DW1205	D.C. 1. (2)	D (W/41 11	This exhibit contains non-public and
16	RX1305	Defendants' Exhibit List	Document Withheld	highly sensitive information including, but not limited to, internal
17				decision-making processes,
18				investment decisions, strategic evaluation of forward-looking
19				opportunities, market share analyses, assessment of the competitive
20				landscape, business partnerships, terms of existing confidential
21				agreements, revenue figures and
22				projections, and internal presentations discussing business strategy, which
23				could be used to injure Activision if made publicly available.
24				1
25	RX1308	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
26				including, but not limited to, internal decision-making processes,
27				investment decisions, strategic evaluation of forward-looking
28				opportunities, market share analyses, assessment of the competitive

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> Camera Treatment	Basis for <i>In Camera</i> Treatment Request
3 4				landscape, business partnerships, terms of existing confidential agreements, revenue figures and
5				projections, and internal presentations discussing business strategy, which
6				could be used to injure Activision if made publicly available.
7 8	RX1310	Defendants'	Document Withheld	This exhibit contains non-public and
9		Exhibit List		highly sensitive information including, but not limited to, internal
10				decision-making processes, investment decisions, strategic
11				evaluation of forward-looking opportunities, market share analyses,
12				assessment of the competitive landscape, business partnerships,
13				terms of existing confidential agreements, revenue figures and projections, and internal presentations
14 15				discussing business strategy, which could be used to injure Activision if
16				made publicly available.
17	RX3000	Defendants' Exhibit List	Redacted Version	This portion contains non-public and highly sensitive information
18		Exilibit List	Forthcoming	including, but not limited to, internal decision-making processes, strategic
19				evaluation of forward-looking opportunities, assessment of the
20 21				competitive landscape, business partnerships, and terms of existing
22				confidential agreements, which could be used to injure Activision if made
23				publicly available.
24	RX3001	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
25				including, but not limited to, internal decision-making processes,
26				investment decisions, strategic evaluation of forward-looking
27 28				opportunities, assessment of the competitive landscape, business
				partnerships, terms of existing

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request
3 4 5				confidential agreements, and revenue figures and projections, which could be used to injure Activision if made publicly available.
6 7 8 9 10 11 12	RX3006	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, and revenue figures and projections, which could be used to injure Activision if made
13 14 15 16 17 18 19 20 21 22	RX3008	Defendants' Exhibit List	Redacted Version Forthcoming	publicly available. This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations discussing business strategy, which could be used to injure Activision if made publicly available.
23 24 25 26 27 28	RX3011	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for In Camera Treatment	Basis for <i>In Camera</i> Treatment Request
3 4 5				projections, and internal presentations discussing business strategy, which could be used to injure Activision if made publicly available.
6 7 8 9 10 11 12	RX3012	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations
13 14				discussing business strategy, which could be used to injure Activision if made publicly available.
15 16 17 18 19 20 21 22	RX3095	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, and revenue figures and projections, which could be used to injure Activision if made publicly available.
23 24 25 26 27 28	RX3101	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and

1	Document	Party Seeking	Information	Basis for In Camera Treatment
2		to Introduce Exhibit	Requested for In Camera Treatment	Request
3				projections, and internal presentations discussing business strategy, which
5				could be used to injure Activision if made publicly available.
6	DATECOA	D 0 1 1		This portion contains non-public and
7	RX5004	Defendants' Exhibit List	Redacted Version Forthcoming	highly sensitive information including, but not limited to, internal
8				decision-making processes,
9				investment decisions, strategic evaluation of forward-looking
10				opportunities, market share analyses, assessment of the competitive
11				landscape, business partnerships, terms of existing confidential
12				agreements, revenue figures and projections, and internal presentations
13				discussing business strategy, which
14				could be used to injure Activision if made publicly available.
15	RX5005	Defendants'	Redacted Version	This portion contains non-public and
16		Exhibit List	Forthcoming	highly sensitive information including, but not limited to, internal
17				decision-making processes, investment decisions, strategic
18				evaluation of forward-looking
19				opportunities, market share analyses, assessment of the competitive
20				landscape, business partnerships, terms of existing confidential
21				agreements, revenue figures and projections, and internal presentations
22				discussing business strategy, which
23				could be used to injure Activision if made publicly available.
24	7777001	D 0 1 1		This portion contains non-public and
25	RX5006	Defendants' Exhibit List	Redacted Version Forthcoming	highly sensitive information
26				including, but not limited to, internal decision-making processes,
27				investment decisions, strategic evaluation of forward-looking
28				opportunities, market share analyses, assessment of the competitive

1 2	Document	Party Seeking to Introduce Exhibit	Information Requested for In Camera Treatment	Basis for In Camera Treatment Request
3 4				landscape, business partnerships, terms of existing confidential agreements, revenue figures and
5				projections, and internal presentations discussing business strategy, which
6				could be used to injure Activision if made publicly available.
7 8	RX5007	Defendants'	Document Withheld	This exhibit contains non-public and highly sensitive information
9		Exhibit List		including, but not limited to, internal decision-making processes,
10 11				investment decisions, strategic evaluation of forward-looking opportunities, market share analyses,
12				assessment of the competitive landscape, business partnerships,
13				terms of existing confidential agreements, revenue figures and
14 15				projections, and internal presentations discussing business strategy, which
16				could be used to injure Activision if made publicly available.
17	RX5008	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
18 19		Emileit Eist	T or une or uning	including, but not limited to, internal decision-making processes,
20				investment decisions, strategic evaluation of forward-looking opportunities, market share analyses,
21				assessment of the competitive landscape, business partnerships,
22				terms of existing confidential agreements, revenue figures and
23 24				projections, and internal presentations discussing business strategy, which
25				could be used to injure Activision if made publicly available.
26	RX5009	Defendants'	Document Withheld	This exhibit contains non-public and highly sensitive information
2728		Exhibit List		including, but not limited to, internal decision-making processes, investment decisions, strategic

1	Document	Party Seeking	Information	Basis for In Camera Treatment
2		to Introduce Exhibit	Requested for In Camera Treatment	Request
3				evaluation of forward-looking opportunities, market share analyses,
4				assessment of the competitive landscape, business partnerships,
5				terms of existing confidential
6				agreements, revenue figures and projections, and internal presentations
7				discussing business strategy, which could be used to injure Activision if
8				made publicly available.
9 10	RX5010	Defendants'	Redacted Version	This portion contains non-public and highly sensitive information
11		Exhibit List	Forthcoming	including, but not limited to, internal decision-making processes,
12				investment decisions, strategic
13				evaluation of forward-looking opportunities, market share analyses,
14				assessment of the competitive landscape, business partnerships,
15				terms of existing confidential agreements, revenue figures and
16				projections, and internal presentations discussing business strategy, which
17				could be used to injure Activision if
18				made publicly available.
19	RX5023	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
20				including, but not limited to, internal decision-making processes,
21				investment decisions, strategic evaluation of forward-looking
22				opportunities, market share analyses, assessment of the competitive
23				landscape, business partnerships,
24				terms of existing confidential agreements, revenue figures and
25				projections, and internal presentations discussing business strategy, which
26				could be used to injure Activision if made publicly available.
27				r ,

1	Document	Party Seeking	Information	Basis for In Camera Treatment
2		to Introduce Exhibit	Requested for In Camera Treatment	Request
3 4	RX5027	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
5				including, but not limited to, internal decision-making processes,
6				investment decisions, strategic evaluation of forward-looking
7				opportunities, market share analyses, assessment of the competitive
8				landscape, business partnerships, terms of existing confidential
9				agreements, and revenue figures and projections, which could be used to
10				injure Activision if made publicly available.
11				
12	RX5028	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information
13				including, but not limited to, internal decision-making processes,
14				investment decisions, strategic evaluation of forward-looking
15				opportunities, market share analyses, assessment of the competitive
16				landscape, business partnerships, terms of existing confidential
17 18				agreements, and revenue figures and projections, which could be used to
19				injure Activision if made publicly available.
20				avanable.
20 21	RX5029	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information
22		Exilibit List	Tortheolining	including, but not limited to, internal decision-making processes,
23				investment decisions, strategic evaluation of forward-looking
24				opportunities, market share analyses,
25				assessment of the competitive landscape, business partnerships,
26				terms of existing confidential agreements, and revenue figures and
27				projections, which could be used to injure Activision if made publicly
28				available.

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Document	Party Seeking to Introduce Exhibit	Information Requested for <i>In</i> <i>Camera</i> Treatment	Basis for <i>In Camera</i> Treatment Request
RX5030	Defendants' Exhibit List	Document Withheld	This exhibit contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, and revenue figures and projections, which could be used to injure Activision if made publicly available.
RX5042	Defendants' Exhibit List	Redacted Version Forthcoming	This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations discussing business strategy, which could be used to injure Activision if made publicly available.

ARGUMENT

I. In Camera Treatment of the Exhibits Is Warranted Under Ninth Circuit Precedent as They Contain Activision's Confidential Business Information

The above-mentioned exhibits contain competitively sensitive business information and warrant in camera treatment at the evidentiary hearing. In the Ninth Circuit, "[p]arties seeking to seal judicial records relating to motions that are 'more than tangentially related to the underlying cause of action,' bear the burden of overcoming the presumption with 'compelling reasons supported by specific factual findings that outweigh the general history of access and the public policies favoring disclosure." *Lenovo (United States) Inc. v. IPCom GmbH & Co.*, KG, 2022 WL 2313948, at *1 (N.D. Cal. Jun. 28, 2022);

see also Kamakana v. City & County of Honolulu, 447 F.3d 1172, 1179 (9th Cir. 2006) ("[T]he court must 'conscientiously [] balance the competing interests' of the public and the party who seeks to keep certain judicial records secret.""). Courts in this Circuit regularly find that sealing is warranted where the records or information that are sought to be sealed could be used "as sources of business information that might harm a litigant's competitive standing." Nixon v. Warner Commc'ns, Inc., 435 U.S. 589, 598 (1978); see also In re Elec. Arts, Inc., 298 F. App'x 568, 569 (9th Cir. 2008) (same); Velasco v. Chrysler Grp. LLC, No. CV 13-08080 DDP (VBK), 2017 WL 445241, at *2 (C.D. Cal. Jan. 30, 2017) (stating that "district courts in this Circuit have sealed records containing 'information about proprietary business operations, a company's business mode or agreements with clients,' [and] 'internal policies and strategies'") (internal citations omitted).

"The Ninth Circuit has explained that 'in general, compelling reasons sufficient to outweigh the public's interest in disclosure and justify sealing court records exist when such court files might have become a vehicle for improper purposes, such as the use of records to . . . release trade secrets." *Velasco*, 2017 WL 445241, at *2 (quoting *Elec. Arts*, 298 F. App'x at 569); *see also Elec. Arts*, 298 F. App'x at 569 ("A 'trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business, and which gives him an opportunity to obtain an advantage over competitors who do not know or use it.") (citation omitted). A court has "broad latitude" to grant protective orders to prevent disclosure of "many types of information, including, but not limited to, trade secrets or other confidential research, development, or commercial information." *Phillips ex rel. Estates of Byrd v. Gen. Motors Corp.*, 307 F.3d 1206, 1211 (9th Cir. 2002).

In determining whether a document should be filed under seal, courts consider, among other things, the measures taken to guard the information's secrecy and the value of the information to the business or its competitors. *E.g.*, *Phillips ex rel. Estates of Byrd v. Gen. Motors Corp.*, 307 F.3d 1206, 1212 (9th Cir. 2002). Here, Activision seeks *in camera* treatment of only the exhibits on Defendants' and the FTC's exhibit lists that reference and reflect, among other things, confidential, proprietary information relating to Activision's internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and

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III. Conclusion

projections, and internal presentations discussing business strategy. The disclosure of this information could be used to injure Activision if made publicly available.

II. In Camera Treatment of the Exhibits Is Necessary to Protect Defendants' Confidential and Proprietary Business Information

Activision seeks *in camera* treatment of the above-mentioned exhibits, which contain Activision's non-public and highly sensitive information. Examples of such confidential information include, but are not limited to, Activision's internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations discussing business strategy. Disclosure of this information would provide Activision's competitors with private data about Activision's performance and business strategy, which could harm Activision's competitive standing. *See Cont'l Auto. Sys. v. Avanci, LLC*, No. 19-cv-02520-LHK, 2019 WL 6612012, at *4 (N.D. Cal. Dec. 5, 2019). As set forth in the supporting Declaration of Page Robinson, Activision actively seeks to maintain the secrecy of the types of confidential information contained in the parties' exhibit lists. Thus, the unsealing of this highly confidential and sensitive information would cause injury to Defendants that cannot be avoided through less restrictive alternatives. (*See* Decl. of Page Robinson, ¶ 5.)

Finally, Activision provided the FTC with confidential business information cited in the Opposition and supporting materials pursuant to the statutory and regulatory guarantees of confidentiality contained in the Hart-Scott-Rodino Act or the FTC Act. *See* 15 U.S.C. §§ 18a(h), 46(f), 57b-2(b), 57b-2(c); 6 C.F.R. § 4.10(d)-(g). In similar cases, the FTC has acknowledged the need to maintain the confidentiality of a party's confidential business information that has been provided to the FTC via a regulatory request. *See*, *e.g.*, *FTC* v. *Lockheed Martin Corp.*, 2022 WL 1446650, at *2 (D.D.C. Jan. 25, 2022) ("According to the FTC, sealing the complaint is appropriate . . . because the filing includes confidential information submitted . . . pursuant to 'statutory and regulatory guarantees of confidentiality.' . . . The requested sealing covers only confidential information and is, according to the FTC, required by regulation.").

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As stated above, compelling reasons justify Activision's request for in camera treatment of the Activision's confidential business information contained in the above-mentioned exhibits. Activision therefore respectfully request that this Court grant its Amended Administrative Motion. In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the Exhibits warranting in camera treatment accompany this Amended Administrative Motion. In accordance with Civil Local Rule 7-11, Activision has also filed a Proposed Order herewith. // // // //

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